REMARKS

In light of the above the amendatory matter and remarks to follow, reconsideration and allowance of this application are respectfully solicited.

Claims 57-63 remain in this application. Claims 57-63 are amended to emphasize the distinction between Applicant's invention and the cumulative teachings of the references relied upon in the Office Action under reply.

Newly cited US Patent 6,157,934 (Khan) was combined with the Enami reference (Image Processing in Program Production – DTPP: Desk Top Program Production) to reject claims 57, 58 and 61. US Published Application 2005/0055239 (Farmer) was added to this combination to reject claims 59 and 62. US Patent 6,212,549 (Page) was added to the Khan-Enami combination to reject claims 60 and 63. Accordingly, all claims 57-63 were rejected in view of prior art. It is respectfully submitted that claims 57-63, as presented herein, are patentably distinct over the combination of khan and Enami, whether or not supplemented by Farmer and/or Page.

Claim 57 is directed to a video program production system in which composition table data is provided to each of the terminals included in the system, with the thus-provided composition table data "describing tasks to be performed and tasks completed by said different operating groups for viewing at each terminal." Thus, each terminal displays tasks associated not only with that terminal itself, but also with tasks associated with different terminals.

It is appreciated the Examiner interprets the various spreadsheets in Khan as corresponding to Applicant's claimed composition table. Khan prepares a master spreadsheet that is displayed only at the server computer. Individual pieces of the master spreadsheet are generated from client computers, which the Examiner interprets as corresponding to Applicant's claimed operating group terminals. However, it is a significant feature of Khan to limit the

display at each client computer only to the specific tasks that can be performed at that client

computer. As stated at column 4, lines 19-21 of Khan, "The user therefore <u>does not see</u> and is

unable to change any of the cells other than those which are linked to the form." Also, column 5,

lines 45-47, Khan states, "Multiple, client spreadsheets <u>display</u> and massage <u>only the parts of the</u>

<u>workflow data which is relevant to the client user</u>." Again, at column 5, lines 53-55, Khan states,

"the use of electronic forms at each client computer... <u>displays only the relevant parts of the</u>

<u>spreadsheet to the client user</u>." (Emphasis added, as noted.) Thus, Khan's master spreadsheet is

not available to or displayed at each client computer. Rather, only the discrete portion of the

master spreadsheet on which the client works is displayed at the client computer. Tasks

associated with different clients are not displayed at any other client computer. This is quite

different from the system of Applicant's claim 57 in which each terminal displays tasks

associated not only with that terminal itself, but also with tasks associated with different

terminals.

Claim 57 also defines each terminal in the video program production system, resulting in,

"the terminals operated by all of said operating groups display the composition table updated by

different ones of said operating groups and thereby the status of all of said operating groups."

This relates to the feature discussed above, in which each terminal in Applicant's claim 57

displays the composition table updated by different ones of the operating groups -- as opposed to

Khan, in which only the small portion of the spreadsheet that a client computer is permitted to

update is displayed at a client computer. Khan does not permit all the client computers to display

the master spreadsheet that may be updated by different clients.

The terminal recited in Applicant's claim 57 also displays the end of task data input into

the composition table from an operating group to instruct a different operating group to perform

the next successive task following the task has been completed by the inputting operating group. By reason of Khan's restriction on what can be displayed at the respective client computers, the completion of the task by one client is not displayed to another and, thus, that other client is not instructed as a result of this nonexistent display to perform the next successive task.

It is respectfully submitted, the addition of Enami to Khan does not cure the aforenoted deficiencies found in Khan. Enami is relied upon for its description of video program production and a video program database. Assuming the spreadsheet of Khan is replaced by video production data, as proposed by the Examiner's rejection, the result still would not permit a given client computer to display the tasks to be performed by other clients. Nor would all of Khan's client computers display video program production information updated by different clients, thereby displaying the status of all of the clients in the system.

Accordingly, in view of the significant differences between Applicant's claim 57 and the cumulative teachings of Khan and Enami, the withdrawal of the rejection of this claim is respectfully solicited.

Claims 58 and 61 were rejected for substantially the same reasons as claim 57. But, claims 58 and 61 recite features that are quite similar to the features of claim 57, discussed above. Namely, the composition table, which is updatable by several different operating groups, is displayed to all of the operating groups, thereby displaying the status of all groups. Accordingly, claims 58 and 61 are patentably distinct over the combination of Khan and Enami for those reasons argued above.

Claims 59 and 62 were rejected as being obvious in view of the combination of Khan, Enami and Farmer. But, these claims recite features similar to the features discussed above in connection with the rejection of claims 57, 58 and 61, namely, the composition table, that is

updatable by several different operating groups, is displayed to all of the operating groups. Thus,

a group will display the resultant composition table even as that table is updated by a different

group. As discussed previously, Khan does not permit this. Enami was cited for his description

of video program production. Farmer was relied upon for describing authorized groups to access

and update only certain items. But, Farmer is directed to an aircraft maintenance system in which

a database supplies maintenance function information to an electronic package that is printed out

for maintenance personnel to perform specific tasks. Once a task is completed and approved by

a manager, information on that task is stored. When a worker logs into a terminal and enters his

ID, a maintenance server determines the task for which that worker is certified to perform, and

the electronic package delineating the task is displayed on the worker's terminal (paragraph

[0032] of Farmer). An electronic record of the work that is completed and authorized is

maintained (Fig. 4 and paragraphs [0049], [0050] and [0053]). There is no suggestion of

displaying the electronic package or the electronic record to all terminals. Thus, Farmer fails to

cure the aforenoted deficiencies in the Khan-Enami combination.

Accordingly, withdrawal of the rejection of claims 59 and 62 as being obvious is

respectfully solicited.

Finally, claims 60 and 63 were rejected as being obvious in view of the combination of

Khan, Enami and Page. These claims recite features similar to those discussed above, and

include the limitation that the terminals operated by all of the operating groups display the

composition table that is updated by the edit operating group, thereby displaying the status of the

edit operating group. That Khan and Enami did not disclose this feature has been discussed

previously. Page was relied upon for describing edit information. However, even if Page is added

to the combination of Khan and Enami, the resultant still would not display to all operating

groups a composition table that is updated by the edit operating group. Accordingly, it is respectfully requested that the rejection of claims 60 and 63 as being obvious in view of the combination of Khan, Enami and Page be withdrawn.

It is further noted the respective references which have been combined and applied against the claims of the present application are from disparate, unrelated arts. There is no motivation, suggestion or underlying reason to combine the spreadsheet assembly system of Khan was the video production system of Enami with the aircraft maintenance system of Farmer with the editing of Page. There is no reason to combine these references in the manner attempted in the office action under reply.

It is respectfully submitted the Examiner has used Applicant's claims as a guide to reconstruct the prior art by assembling individual, unrelated bits and pieces. It is improper to use the hindsight gained from Applicant's specification, and then use that hindsight to reassemble the prior art in an effort to reject Applicant's claims. The only motivation to use these references in the manner attempted by the Examiner is provided solely by Applicant himself. The Court of Appeals for the Federal Circuit, as well as its predecessor court, has long held that obviousness cannot be established by combining the teachings of the prior art to produce the claimed invention, absent some teaching, suggestion or incentive supporting the combination. Although *KSR* has relaxed the standard for combining multiple references, it still is impermissible to use Applicant's claims as a frame and the prior art references as a mosaic to piece together a facsimile of the claimed invention. But that is precisely what has been done in the present case. Accordingly, the rejection of claims 57-63 should be withdrawn.

Since the cumulative teachings of the prior art that has been applied against Applicant's claims fail to disclose all of the limitations recited by those claims, claims 57-63 are unobvious and are in condition for allowance.

Statements appearing above in respect to the disclosures in the cited references represent the present opinions of the undersigned attorney and, in the event the Examiner disagrees with any of such opinions, it is respectfully requested that the Examiner specifically indicate those portions of the references providing the basis for a contrary view.

Please charge any additional fees that may be needed, and credit any overpayment, to our Deposit Account No. 50-0320.

Respectfully submitted,

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